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WRITER'S DIRECT NO.

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July 28, 2000

BY HAND

Ms. Magalie R. Salas
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Written Ex Parte Presentation
CC Docket No. 94-102

Dear Ms. Salas:

On behalf of my client QUALCOMM Incorporated ("QUALCOMM"), this is to provide the Commission and the staff of the Wireless Telecommunications Bureau with additional information to demonstrate that there is available to GSM carriers deployable handset-based location technology that meets the FCC's accuracy requirements, and this technology could be made commercially available to the GSM carriers, if they act promptly.

Last week, SnapTrack, a wholly-owned subsidiary of QUALCOMM, concluded the second phase trials of its wireless assisted GPS technology in Europe with European GSM carriers, including demonstrating multicountry cross-border roaming to more than a dozen wireless industry players. These trials were conducted under the auspices of the SnapTrack GSM Test Group ("STGTG"), which includes ten major GSM carriers and seven manufacturers. As part of these tests, a France Telecom Mobiles subscriber in Paris was located at a France Telecom R&D facility in Southern France, using QUALCOMM's technology over a GSM wireless network. In addition, a France Telecom Mobiles subscriber was located while roaming on the networks of various carriers in downtown London. For these tests, an electrically-integrated GSM handset, containing SnapTrack's wireless assisted GPS technology was used.

The technology demonstrated in these European trials could be used by U.S.-based GSM carriers if they chose to implement it and if they requested their handset manufacturers to make

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handsets including it, neither of which has yet occurred. The technology has been licensed to major manufacturers of semiconductors who supply chips and chipsets to manufacturers of handsets, who in turn supply handsets to U.S.-based GSM carriers.

Attached hereto are materials providing the Commission with additional information on this demonstration.

Sincerely yours,



Dean R. Brenner

Attorney for QUALCOMM Incorporated

cc: Chairman William E. Kennard
Commissioner Susan Ness
Commissioner Gloria Tristani
Commissioner Michael Powell
Commissioner Harold Furchtgott-Roth
Thomas Sugrue, Esq.
James Schlichting, Esq.
Kris Monteith, Esq.
Blaise Scinto, Esq.
Dan Grosh, Esq.

SnapTrack GSM Test Group (STGTG)

Operator Members

- BT Cellnet (UK)
- Esat Digifone (Ireland)
- Europolitan (Sweden)
- France Telecom (France)
- Omnitel Pronto Italia (Italy)
- Powertel (US)
- Telefonica (Spain)
- T Mobil (Germany)
- Telecel (Portugal)
- Vodafone AirTouch (US & UK)

Manufacturer Members

- CMG (Netherlands)
- Motorola (US)
- Nortel (Canada)
- Phillips (France)
- Siemens (Germany)
- Signalsoft (US)
- Texas Instruments (US)

STGTG Trial

Objectives Summary

<u>OBJECTIVES</u>	PHASE 1 Madrid, Spain October, 1999	PHASE 2 Paris, France July, 2000
▪ Characterize Performance of SnapTrack Technology in Representative European Environments	✓	✓
▪ Demonstrate Commercial Applications Which Take Advantage of Highly Accurate Location	✓	
▪ Prove the Feasibility of Inter-Network Roaming With Minimum, if any, Carrier Information Exchange.		✓
▪ Verify and Validate Performance of SnapTrack Wireless Assisted GPS Technology When Integrated into GSM; data bearer: SMS		✓
▪ Demonstrate Feasibility of SnapTrack Technology in Integrated Handset Form Factor		✓



GSM Demonstration

July 2000

- Located a France Telecom Mobiles subscriber in Paris
 - Located at France Telecom R&D Facility in Southern Paris
 - France Telecom Network
- Located a France Telecom Mobiles subscriber roaming in and around the City of London, England
 - Downtown London
 - Roaming Network (variously Vodafone, One2One, Orange)

STGTG Phase 2 Trial

Team Work!

□ Trial Partnership:

- France Telecom Mobiles
- Handset manuf.
- CMG
- SnapTrack

